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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
ANN BODKIN,

Plaintiff,

-against-

SOUTH HUNTINGTON UNION FREE
SCHOOL DISTRICT,

Defendant.

-----X

**Index No.: 12-CV-1545
(LDW)**

**PLAINTIFF'S
PROPOSED VOIR DIRE**

Rather than reiterate the standard jury questions, which Plaintiff is confident that the Court already plans on asking during jury selection, Plaintiff submits, by and through her counsel, The Law Office of Steven A. Morelli, P.C., the following brief list of additional jury questions, which she respectfully requests be asked during jury selection in this matter:

1. Are you current employed? If so, what is your current occupation?
2. Are you a member of any union? If yes, please name.
3. How much formal education have you completed? In what areas of study?

4. Have you ever been a party to a lawsuit? If so, were you a plaintiff or Defendant?

What was the nature of the action?

5. Are you currently, or have you ever worked as a teacher at a school? Which school?

6. Do you have any members of your family that work, or have worked as a teacher?

7. Do you have any members of your family that work, or have worked as a school administrator?

8. Have you ever felt that you were treated unfairly on the job? What were the circumstances? What, if anything, did you do about it?

9. Have you ever had any experience with a discrimination or retaliation claim, whether it was filed by you, against you or by someone in a company for which you worked? Please tell us about it?

10. Do you suffer from any physical or mental condition that you would describe as a disability?

11. Do you believe it is acceptable for an employer to treat an employee differently on the basis of his or her disability? If so, under what circumstances?

12. Do you believe it is acceptable for an employer to treat an employee differently on the basis of his or her age? If so, under what circumstances?

13. Do you believe that an employee has the right to speak out, or complain about what they perceive to be discrimination?

14. Do you live in the Town of Huntington?

15. Do you know anyone who has children attending the South Huntington Union Free School District?

16. Do you know any of the following individuals, and if so, how?

- a. Ann Bodkin
- b. Thomas Shea
- c. Roberta Lewis
- d. Joanne Hilli-Carbone
- e. Dennis Callahan
- f. Gay Bullock
- g. Timothy Eagen
- h. Dr. Jonathan Ippolito
- i. Stephanie Brown
- j. Merryl Rogers

- k. James Romanelli
- l. James Polansky
- m. Jill Okurowski
- n. Melissa Smith
- o. Hilcia Suazo-Brandt
- p. Anna Scricca
- q. Joseph Carbone
- r. Mike DiRenzo
- s. Robert Rotunda
- t. Kevin Connolly
- u. Matt Glassberg
- v. Rosalie Reyes
- w. Joshua Beldner
- x. Paul Bartels
- y. John Shields

17. Have you ever served on a jury? If so, was it a civil case or criminal case? Were you satisfied with this experience as a juror?

Dated: Garden City, New York
June 6, 2014

Respectfully submitted,

/S/

Joshua Beldner (JB-2182)
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